

May 16, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: ET Docket No. 08-59, Amendment of the Commission's Rules to Provide
Spectrum for the Operation of Medical Body Area Networks

Dear Ms. Dortch,

On May 14, 2012, representatives of Philips Healthcare, GE Healthcare, the Aerospace and Flight Test Radio Coordinating Council (AFTRCC), and the American Society for Healthcare Engineering of the American Hospital Association (ASHE) met with FCC staff members to discuss issues in the above-referenced proceeding. A list of participants is attached.

The meeting focused on the technical rules proposal put forward by the parties earlier that would permit spectrum sharing in the 2.36 – 2.4 GHz band. The staff advised that the rules proposed by the parties had been revised in a number of respects, but that the revisions had been undertaken with an eye toward preserving the parties' intent as reflected in their joint proposal. The text of the rules proposed by the staff was not before the parties. Accordingly, while the revisions by the staff appeared to allow for an effective technologically-based sharing arrangement between primary aeronautical telemetry and secondary Medical Body Area Networks, the parties were not in a position to offer any definitive views pending a review of the text of the report and order once adopted and released by the Commission.

There also was discussion that, as outlined by the staff, the changes to the parties' proposal place additional responsibility upon the spectrum coordinators for resolving a range of issues such as coordination criteria, hospital transition plans, and technological default mechanisms. AFTRCC expressed concern that selection of an MBANs coordinator or coordinators must be contingent on such entity(ies) reaching an agreement with AFTRCC as the AMT coordinator. However, appointment of an MBANS spectrum coordinator or coordinators apparently will be delayed until conclusion of an additional proceeding and Public Notice soliciting candidates. Philips expressed concern that this would delay introduction of MBANS devices into the marketplace.

Marlene H. Dortch
May 16, 2012
Page 2

Respectfully Submitted,

/s/

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Attachment

Attendees at May 14, 2012 Meeting re MBANS, Docket 08-59

FCC / Office of the Chairman

Charles Mathias
Renee Wentzel
Maya Uppaluru

FCC / Office of Engineering and Technology

Julius Knapp
Ira Keltz
Alan Stillwell
Bruce Romano
Geraldine Matise
Rashmi Doshi
Mark Settle
Jamison Prime
Brian Butler
Shane Huang

Philips Healthcare

Delroy Smith
Dong Wang
David Siddall

GE Healthcare

Matt Grubis
Steve DeCorte
Neal Seidl
Ari Fitzgerald

AFTRCC

Joe Cramer
Chip Yorkgitis
Giselle Creeser
Dan Jablonski
Ken Keane
Dan Hankins

ASHE

Mark Gibson
Larry Movshin